

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE
DISTRICT OF TENNESSEE

Dr. Regina Jordan-Sodiq,) Case No.: 3:25-cv-00288
Plaintiff) Judge Eli Richardson Jury Demand
)
v.)
State of Tennessee et. al.,)
Defendants and Fifth Third)
Bank, Defendant)

PLAINTIFF'S REPLY IN SUPPORT OF MOTION TO COMPEL

Plaintiff Dr. Regina Jordan-Sodiq files this Reply in Support of her Motion to Compel Disclosure of Hearing Date (“Motion to Compel”) [ECF 69] and responds to Defendant Fifth Third Bank’s opposition [ECF 76] as follows:

1. **Plaintiff’s Diligent Efforts to Obtain a Hearing Date:** Plaintiff has repeatedly contacted the District Court requesting notice of a hearing date for pending motions and has consistently been informed that no hearing date has been set. Plaintiff’s continued efforts to obtain this information reflect a good-faith attempt to comply with scheduling requirements and properly prepare responses.
2. **Plaintiff’s Good-Faith Attempt to Confer:** Defendant asserts that Plaintiff failed to confer in good faith prior to filing the Motion to Compel. However, Plaintiff attempted to engage with opposing counsel via phone call May 22, 2025 and email **Exhibit B**, yet received no response. Given Defendant’s lack of engagement, Plaintiff had no alternative but to seek Court intervention, in full compliance with Local Rule 37.01(a).
3. **Defendant’s Prematurity Argument Is Misplaced:** Defendant argues that Plaintiff’s Motion to Compel is premature due to its pending Motion to Dismiss. However, obtaining clarity on scheduling directly impacts Plaintiff’s ability to prepare procedural responses in accordance with court deadlines. The requested disclosure promotes procedural fairness and efficiency.
4. **Registered Agent Disclosure and Return to Sender Issue:** Defendant states that its registered agent’s information is publicly available yet fails to provide explicit details within its response. Furthermore, Plaintiff mailed a formal notice to Defendant’s registered agent and the attorney who filed the Motion to Dismiss. However, Plaintiff received a “**Return to Sender**” letter, raising concerns regarding proper service and procedural fairness. Plaintiff has also emailed Defendant’s attorney and will use the **CM/ECF electronic filing system** to ensure formal service and record preservation. Plaintiff seeks confirmation of the correct address for service to ensure compliance with procedural rules.

- **Exhibit A:** Attached hereto is a copy of the return-to-sender correspondence addressed to Defendant's registered agent and counsel, further evidencing service difficulties.
- **Exhibit B:** Attached hereto is a copy of the email dated 22 May 2025 addressed to KRogers@burr.com, given as the email address for the Defendant's attorney.

For the foregoing reasons, Plaintiff respectfully requests that the Court grant her Motion to Compel and direct Defendant to engage in good-faith resolution of the matters at issue.

CERTIFICATE OF SERVICE

I hereby certify that on this **23rd day of May 2025**, a true and correct copy of **PLAINTIFF'S REPLY IN SUPPORT OF MOTION TO COMPEL** was served via **electronic filing** upon the following:

Defendants' Counsel: Katherine R. Rogers, Burr & Forman, LLP; email: krogers@burr.com and their Registered Agent Corporation Service Company located at as per "return to sender" envelope, 300 Montvue Road Knoxville TN 37919.

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

Respectfully submitted this 23rd day of May, 2025.

DRS
Dr. Regina Jordan-Sodiq, Pro se
1757 Autumnwood Blvd.
Clarksville, TN 37402 ;G4818@yahoo.com

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

DR
Decina Jordan-Sadig

Plaintiff(s),

v.

State of Tennessee et.al. and

Defendant(s).

Fifth - Third Bank Defendant

Case Number 3:25-CV-00288

Judge Judge Eli Richardson

Magistrate Judge Jury Demand

Plaintiff's Reply in Support of Motion to Compel
and Exhibits (Type of Pleading)

① Exhibit A: Attached is a copy of "Return to Sender" correspondence addressed to both Defendant's Attorney K. Rogers and Registered Agent CFS Corporation Service Company

② Exhibit B: Attached is a copy of email dated 22 May 2025 addressed to krogers@burr.com

①

(Name) Linda & Jim Sains and ex-wife
(Address) 214 Creek Street
Montgomery, IN 31268

(Name) Aaron W. Colle
(Address) 1061 Gates St
(Telephone) 211-1000 Street
(Name) Tracy
(Address) 1008 2nd
(Telephone) 211-1000 Street

8
Dinner
(Address)
(Address)
(Name)
(Address)
(Address)
R. M. S. Inc., P. O. Box 1400
1320 Adams St., Suite 1400
Nashville, TN 37208
Knoch
6000 Peachtree Street, NE, Suite
11100 11th 30008

(Name) John H. Vollerhicle
(Address) 1503 3rd Avenue South Suite 1600
(Name) Die William Denot
(Address) 3170 18th Street Suite 1100
(Address) Nashville TN 37203

1 22

Continue -

S. 1000

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following
has been served on:

(Name)

(Address)

(City/State)

23rd May 2025
S. D. Dabbs

~~DD~~ ~~DD~~
Doris
Reinette Jordan-Sobey
(First Name)

1757 Autumnwood Blvd
Clarksville, TN 37042
(931) 561-2546

Address & Telephone Number, if any)

(4)

Plaintiff's Attempt to Confer Defense Counsel
From:regina jordan (g4818@yahoo.com)
To:krogers@burr.com
Date:Thursday, May 22, 2025 at 11:10 AM CDT

*Exhibit
B*

Message Body

Subject: Follow-Up on Motion to Compel

Dear Katherine R. Rogers, Esq.,

Today, I called your office regarding Fifth Third Bank's response to my Motion to Compel. My call was forwarded to your legal assistant's Angela Beasley's, voicemail, but I did not leave a message at the time.

I wanted to follow up to ensure my inquiry reaches the appropriate party. Specifically, I seek clarification regarding Fifth Third's assertion that my request is premature due to their pending Motion to Dismiss, which they claim is dispositive. I would like to discuss how this impacts the necessity of disclosure, particularly given that hearing dates and registered agent information should be readily available for transparency in legal proceedings.

Please advise on how best to proceed or if there is a preferred method for discussing this matter further. I appreciate your time and assistance.

Best regards,
Dr. Regina Jordan-Sodiq, Pro se

return to
sender

23 APR 2025 8PM 11 37
MAGGIE HENRY

→ **Rocky Mountain Dog**
This address
is not correct
for a dog
but it is
a good
place to
keep a
dog
in Mexico

21/09/2019
21/09/2019

7205/01/25
372 4C1
NIXIE
KANOKWON
UTF
BC: 37042171357
*2459-00229-21-37
RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

— 9327020528331459 —

Exhibit A